

United States Department of Justice

United States Attorney Northern District of New York

100 South Clinton Street, P.O. Box 7198 James M. Hanley Federal Building Syracuse, New York 13261-7198

Tel.: (315) 448-0672 Fax: (315) 448-0646

November 20, 2024

VIA CM/ECF

Hon. Thérèse Wiley Dancks U.S. Magistrate Judge Federal Building and U.S. Courthouse P.O. Box 7346 Syracuse, New York 13261-7346

Re: Long et al. v. U.S. ICE & U.S. CBP: Request for Extension of Reply Deadlines

Civil Action No.: 5:23-CV-1564 (DNH/TWD)

Dear Judge Dancks:

Currently, this Court's Text Order from August 6, 2024, governs the deadlines for filing the remaining papers regarding the parties' cross-motions for summary judgment. See Dkt. # 36. The Text Order requires Defendants to file their opposition and reply papers on December 3, 2024, and requires Plaintiffs to file their reply papers on December 30, 2024. Defendants write to respectfully request (1) an extension of their deadline to file reply papers in further support of Defendants' motions for summary judgment and in opposition to Plaintiffs' motions for summary judgment until December 13, 2024, and (2) an extension of Plaintiffs' deadline to file reply papers in further support of Plaintiffs' motions for summary judgment until January 16, 2025. Plaintiffs' counsel has consented to this request.

Respectfully Submitted,

CARLA B. FREEDMAN United States Attorney

By: /s/ David M. Katz

David M. Katz

Assistant United States Attorney

Bar Roll No. 700065

CC: Counsel for all parties of record (via CM/ECF)